

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA

UNITED STATES OF AMERICA,

v.

Criminal Action No. 2:24-CR-4

NITESH RATNAKAR,

Defendant.

**DEFENDANT'S NOTICE OF SUPPLEMENTAL AUTHORITY
IN SUPPORT OF HIS MOTION FOR NEW TRIAL APPEAL**

Defendant, Nitesh Ratnakar, hereby gives notice of the following supplemental authority in support of his pending motion for new trial pursuant to Rule 33 of the Federal Rules of Criminal Procedure.

1. *United States v. Rafiekian*, 68 F.4th 177 (4th Cir. 2023)
2. *United States v. Elfenbein*, 708 F. Supp. 3d 621 (Dist. Md. 2023)
3. *United States v. Hernandez*, 2023 U.S. Dist. LEXIS 105424 (E.D. Va. 2023)

Respectfully submitted,

s/s David M. Garvin

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 12, 2025, I electronically filed the foregoing Notice of Supplemental Authority in Support of Defendant's Motion for New trial with the Clerk of the Court using CM/ECF, which will send notification of such filing to all counsel of record.

/s/ Harry A. Smith, III

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